March 13, 2012

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Re: Draft SWMI Proposal

Please accept my comments to the February 3, 2012 draft SWMI proposal.

Whitman's Pond, in East Weymouth is a prime example of what doesn't work. My comments are about what the current safe yield, registered withdrawal, firm yield and Water Management Act allow to happen when the entire environment is not taken into account. A one size fits all approach does not work. These pictures reflect that approach.

There are five municipal wells within walking distance of Whitman's Pond, south cove section in Weymouth. The Great Pond Reservoir system includes Great pond, Old Swamp River and the south cove section of Whitman's Pond. The Great Pond Reservoir system provides 80% of Weymouth drinking water supply. Five groundwater wells account for 20% of their drinking water system. An unlimited amount of water can be drawn from Whitman's Pond to Great Pond.

Whitman's pond in East Weymouth, MA is one of Weymouth's surface drinking water supplies. I grew up on Whitman's Pond, which is located in East Weymouth MA. East Weymouth is part of the overall town of Weymouth.

I no longer live in Weymouth, but know Whitman's Pond very well. I lived on the pond in the great drought of 1964 -65yr. In the summer of 1964, this pond was not as low as it was in 2007. As a matter of fact, you could still boat on the pond during the drought of 1964, as I did. Old Swamp River was reduced to mud in 1964.

In 1964 Great Pond was Weymouth's only surface water supply. Whitman's Pond was not part of Weymouth drinking water supply; it was a recreation pond only. When Great Pond was drawn down by water withdrawals during the drought of 1964, a 400 year old Indian canoe was found in the exposed mud of Great pond. This canoe is now in the Tufts Library on Broad St. Weymouth Landing.
After the drought is was determined another surface water supply was needed as a back up to Great Pond in South Weymouth, since Great Pond was the only surface water supply at the time.
What I find hard to accept is towns keep building without any thought of what is happening to their water resources. Rather than depleting valuable assets like Whitman's Pond and its herring run, why doesn't the state set safe yield limits to protect our assets? MADEP's water banking does not work as effectively as it should, because developers don't necessarily save 2 gallons per 1 gallon used as stipulated by the water banking agreement. Sometimes they just pay the towns money.

The following pictures show what happens to a water supply when there is excessive pumping. They also show the effects on pond habitat, which has an effect on marine fisheries. Whitman's Pond supports a herring run via a fish ladder at the northeast end of the pond near Iron Hill St. Herring are a critical food source for commercially important fish such as cod, and recreationally important fish such as striped bass. If more water is allowed to be pumped from this pond to Great Pond for drinking water purposes, herring won't be able to spawn here. There are a limited amount of places where herring spawn already.

On July 18, 2007, The Secretary of Environmental Affairs issued a Certificate on the Final Environmental Impact Report for EOEA# 11085R Naval Air Station Redevelopment Project for the project proponent South Shore Tri-Town Development Corporation (SSTTDC) and LNR South Shore LLC. That certificate stated the preferred water supply alternative identified in the FEIR is a direct connection with the Massachusetts Water Resources Authority (MWRA) water works system. I was appointed to the citizens Advisory Committee to the MEPA process for the former South Weymouth Naval Air Station EOEA#11085R.
The FEIR states," Using Weymouth water to supply the project demands for phase I allows this phase to be built while the transmission main from the MWRA can be completed" (FEIR, May 31,2007, water supply section 10.0 page 10.5)

ARAWH (Advocates for Abington, Rockland, Weymouth and Hingham), through an EPA grant, hired Matt Robbie of E2 Inc. (now Skeo) to evaluated the Weymouth water and sewer system. This is a quote from his report, ""Currently, there are no MassDEP regulations in place that would prevent the Town of Weymouth from making continual water withdrawals from Whitman's Pond, provided that withdrawals do not exceed an average daily volume of 4.51 mgd." "**Former South Weymouth Naval Air Station Water Supply Status and Regulatory Review"**

In the SSTTDC September 2011 contract agreement with Environmental Partners it states, "SSTTDC is currently proposing an alternative water and sewer service concept for the Southfield development, different than the options selected in the Final Environmental Impact Report and Notice of Project Change. Under this new concept it is being proposed that Southfield will be separated into two distinct water/sewer service zones. The Weymouth service zone will represent approximately 40% of the total water and sewer needs, while the Abington/ Rockland service zone will represent approximately 60% of the project's total water and sewer needs."

Weymouth is not currently supplying the 245,000 gpd that it is contracted to supply to Southfield (former NAS South Weymouth) in the Phase I development. What will happen to Whitman's Pond when they start supplying 245,000 gpd more from Weymouth's surface water supply.

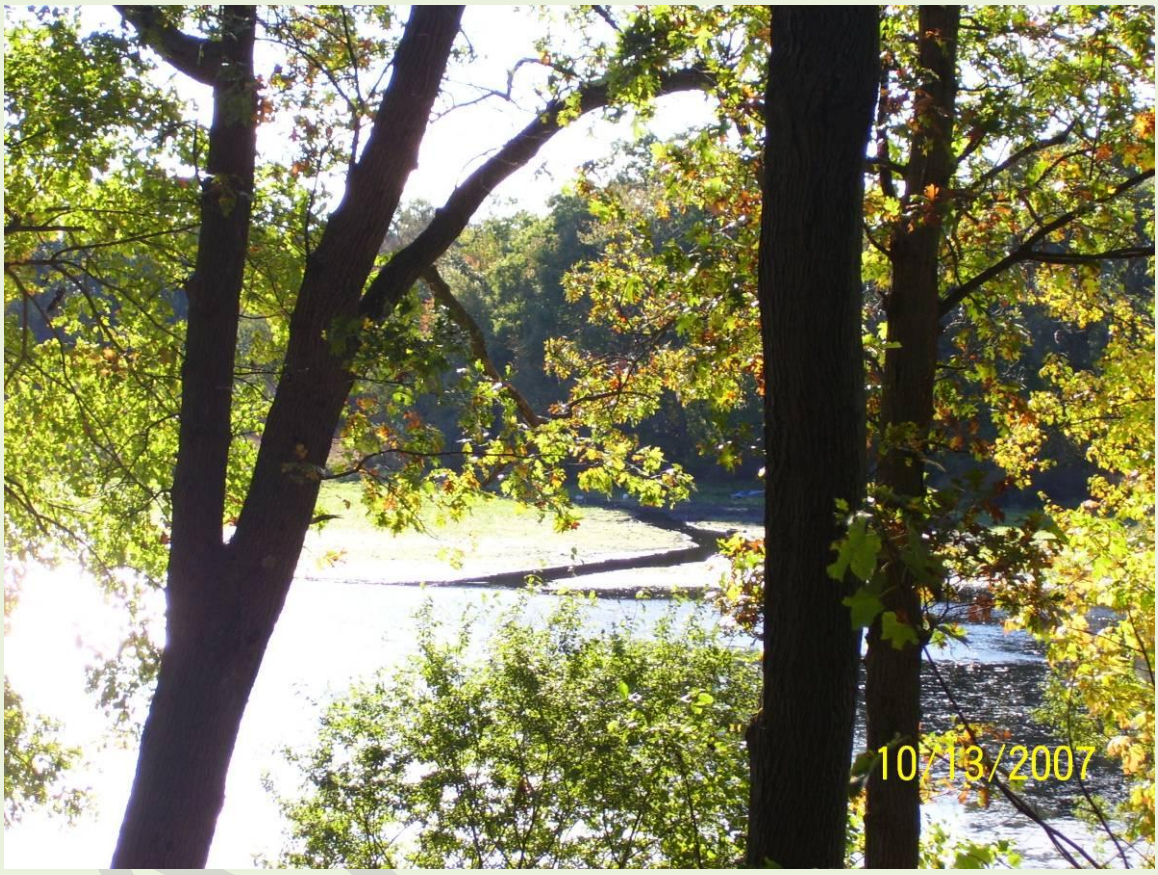
The next pictures are of dead fry in the Weymouth Herring run and a dry herring run. If MADEP raises the safe yield, firm yield and registered withdrawals to accommodate new building conditions will get even worse.


07/06/2010

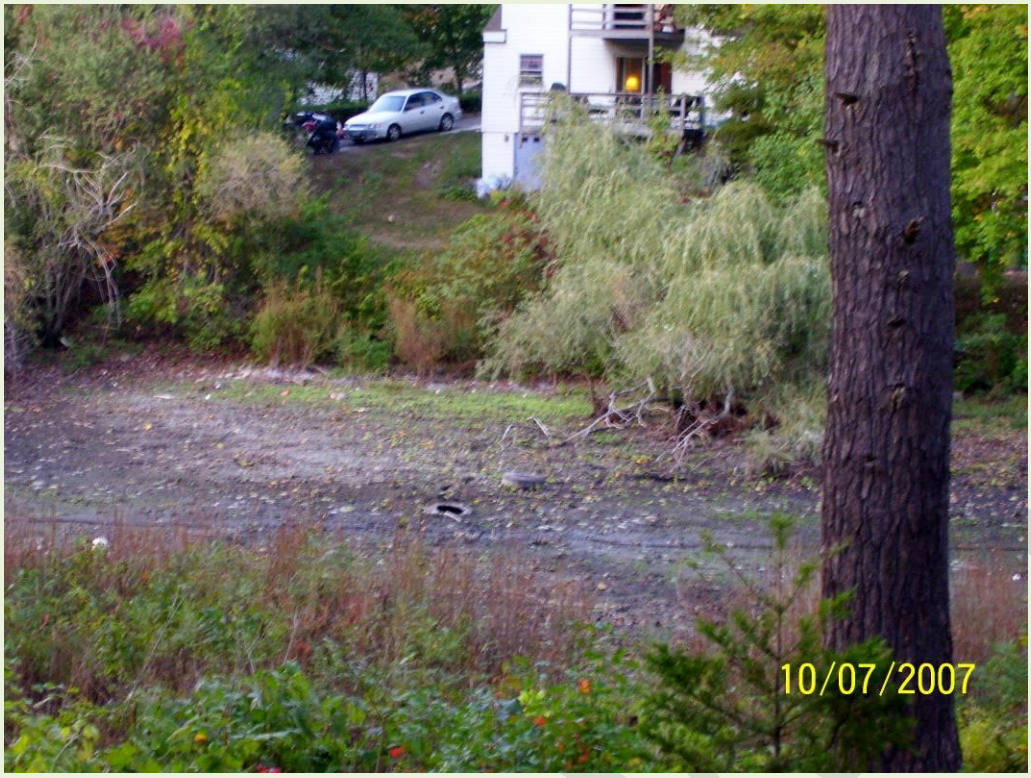

07/06/2010

Old Swamp River is NOT the main feed of Whitman's Pond south cove section, as can be seen in the picture below. Stream gauging, only, is not an effective way of determining the GPD withdrawal of Whitman's Pond for drinking water purposes as the pictures show.

The picture below shows the outline of Old Swamp River in Whitman's Pond, south cove section. This is not normal. Whitman's Pond usually fills the area in the picture below.



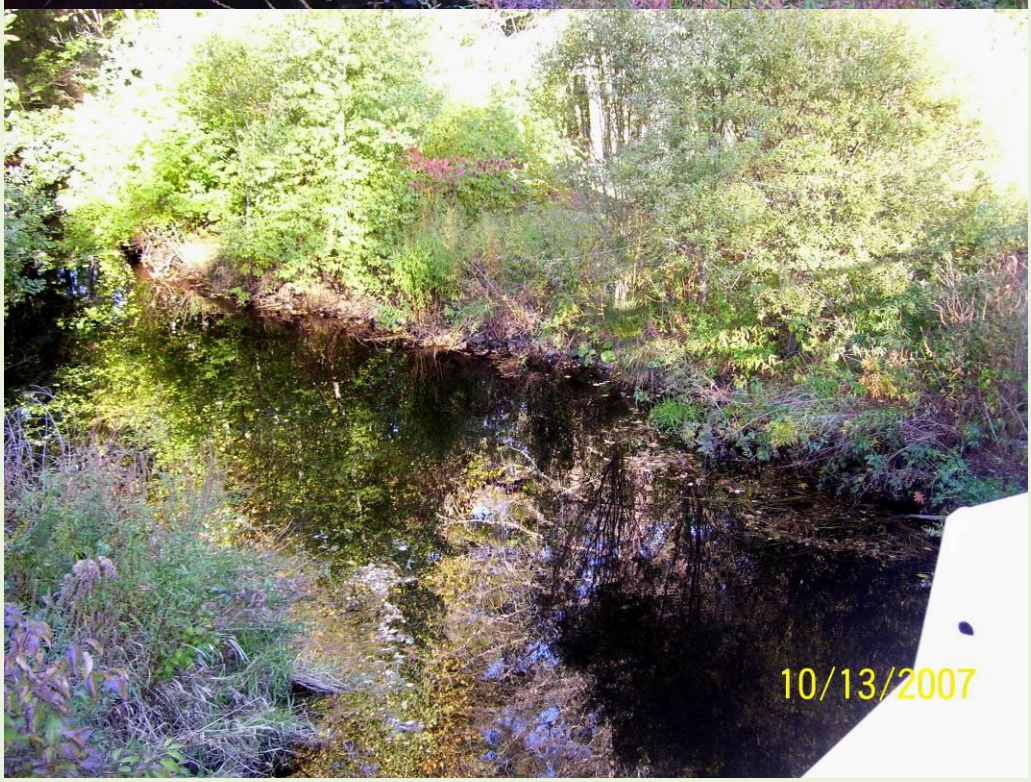
The next picture shows the devastation of Whitman's Pond, south cove section from drawdown of water pumped to Great Pond in South Weymouth for drinking water. Water from Whitman's Pond is routinely pumped up to Great Pond in South Weymouth. Herring spawn in this pond yearly and in the south cove section.



The next photo is of Whitman's Pond cove. This cove did not dry up even when it is cut off from the main body of the pond.

The next pictures are Old Swamp River just before it enters Whitman's Pond, south cove section. It isn't suffering like the pond is. It took this pond many months to recover from the devastation caused by excessive pumping to Great pond, just to have Weymouth draw it down again the next summer.


10/13/2007


10/13/2007

These pictures are of Whitman's Pond, south cove side. The pictures are the same but the dates are different. The dark stains on the stone pier show where the water line normally is. This entire area should be filled with water.


07/13/2008


08/07/2010

. The pictures of what looks like an open field are of a dry Whitman's Pond. This entire area should be filled with water.


10/31/2007


11/10/2007


11/24/2007

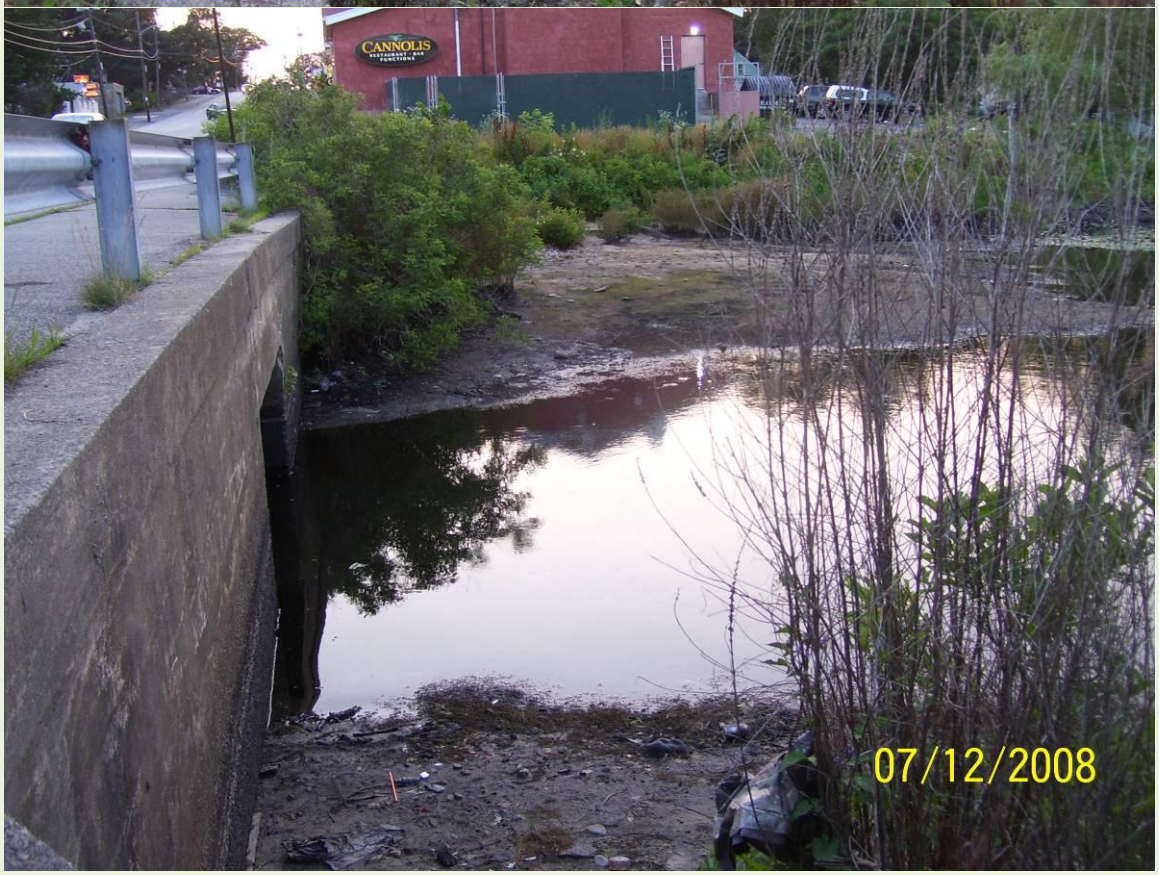

07/13/2008

As you can see in the pictures above, growth of undesirable aquatic vegetation has taken hold in Whitman's Pond

The south cove side of Whitman's Pond also has an effect on the north side (or main body) of Whitman's Pond as seen in the next set of pictures of the north side of Whitman's Pond, at the Washington Street bridge. The current flows from south to north (i.e. left to right). From the Whitman's Pond, south cove section, to the north side of Whitman's Pond. This flow is needed to keep Whitman's Pond full in summer. Pumping of water from Whitman's Pond to Great Pond reduces the flow into Whitman's Pond, and causes the water level to drop in both Whitman's Pond, south cove section, and the north side of Whitman's Pond.

The dam on Whitman's Pond is located at Iron Hill Rd. in East Weymouth. The herring run ladders are also located there.


CANNOLIS
10/07/2007


CANNOLIS
07/12/2008

The next pictures are of the north side (or main body) of Whitman's Pond.


07/12/2008


07/07/2010


07/14/2011


09/22/2007


10/28/2007


07/12/2008

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